

EXHIBIT C

From: [Annie McAdam](#)
To: [Don Haviland](#)
Cc: [ecabraser@lchb.com](#); [pgeller@rgrdlaw.com](#); [mdearman@rgrdlaw.com](#); [Bill Platt](#); [efastiff@lchb.com](#); [James Dugan](#)
Subject: RE: Opioids TPP
Date: Monday, December 2, 2024 4:01:12 PM

Don,

Besides Asbestos Workers Philadelphia/Avon Grove/and Plumbers Local Union 690, neither the claims administrator, interim co-lead class counsel, nor the defendants' counsel received the exclusion notices for the 60 entities listed on your spreadsheet and, accordingly, we do not believe they should be considered as having opted out. If you disagree, please let us know how and when these entities submitted their purported opt out notices.

As you know, AB Data has the most complete and thorough list of TPPs of any claims administrator, and it used the same comprehensive list here as it always uses in TPP settlements. For the payors that you claim did not receive class notice, please provide the names of those entities and we will check with claims administrator.

James

From: James Dugan <jdugan@dugan-lawfirm.com>
Sent: Monday, December 2, 2024 2:59 PM
To: Don Haviland <haviland@havilandhughes.com>
Cc: [ecabraser@lchb.com](#); [pgeller@rgrdlaw.com](#); [mdearman@rgrdlaw.com](#); [Bill Platt](#) <platt@havilandhughes.com>; [efastiff@lchb.com](#); [Annie McAdam](#) <amcadam@dugan-lawfirm.com>
Subject: Re: Opioids TPP

A response coming asap
Sent from my iPhone

On Dec 2, 2024, at 1:52 PM, Don Haviland <haviland@havilandhughes.com> wrote:

James,
I haven't heard from you as to the request for consent.

For your convenience, I am attaching the two confirmed, belated opt outs about which we spoke last week: IBEW 126 (received today from the fund) and Cement Masons 526 (received before the holiday from fund counsel).

We also heard from NY counsel for a Laborers fund, which is having a Trustee meeting tomorrow morning, during which they expect to discuss the settlement. (A recurring problem with the timing of the settlement notice is that it came after the fall trustee meetings were conducted.).

Should the Laborers decide to opt out, we would include them as well in our late opt out request.

Please confirm receipt.

Thanks

-Don

Donald E. Haviland, Jr., Esq

Haviland Hughes

Please note our new address:

124 S. Maple Ave., Suite 220

Ambler, Pa 19002

Ph 215-609-4661

Fax 215-392-4400

Ambler – Philadelphia

Atlantic City – Lehigh Valley

From: Don Haviland

Sent: Monday, December 2, 2024 9:55 AM

To: 'James Dugan' <jdugan@dugan-lawfirm.com>

Cc: ecabraser@lchb.com; pgeller@rgrdlaw.com; mdearman@rgrdlaw.com; Bill Platt <platt@havilandhughes.com>

Subject: RE: Opioids TPP

James

As I told you before the holiday, we have a few funds that did not receive the class notice and would like to file late opt outs.

We should do so today, in conjunction with your status report on opt outs to the court.

We realize this will require court approval, but we are hoping to garner consent of plaintiff counsel.

Please let me know by mid-day whether MDL Plaintiffs consent to the request.

Thanks

-Don

Donald E. Haviland, Jr., Esq

Haviland Hughes

Please note our new address:

124 S. Maple Ave., Suite 220
Ambler, Pa 19002
Ph 215-609-4661
Fax 215-392-4400
Ambler – Philadelphia
Atlantic City – Lehigh Valley

From: James Dugan <jdugan@dugan-lawfirm.com>

Sent: Wednesday, November 27, 2024 2:53 PM

To: Lori Dillinger <LDillinger@havilandhughes.com>

Cc: Don Haviland <haviland@havilandhughes.com>; ecabraser@lchb.com;
pgeller@rgrdlaw.com; mdearman@rgrdlaw.com; Bill Platt
<platt@havilandhughes.com>

Subject: Re: Opioids TPP

Got it thanks

Sent from my iPhone

On Nov 27, 2024, at 11:37 AM, Lori Dillinger
<LDillinger@havilandhughes.com> wrote:

Hi Mr. Dugan,

I have attached an excel spread sheet with the full list of the plans
that have elected the opt out.

Kind Regards,

Lori

Lori Dillinger

on behalf of Haviland Hughes

124 S. Maple Ave., Suite 220
Ambler, Pa 19002
Ph 215-609-4661
Fax 215-392-4400
Ambler – Philadelphia
Atlantic City – Lehigh Valley

From: James Dugan <jdugan@dugan-lawfirm.com>
Sent: Wednesday, November 27, 2024 12:17 PM
To: Don Haviland <haviland@havilandhughes.com>
Cc: ecabraser@lchb.com; pgeller@rgrdlaw.com; mdearman@rgrdlaw.com; Bill Platt <platt@havilandhughes.com>; Lori Dillinger <LDillinger@havilandhughes.com>
Subject: Re: Opioids TPP

Much appreciated
Sent from my iPhone

On Nov 27, 2024, at 11:10 AM, Don Haviland
<haviland@havilandhughes.com> wrote:

Thx James
We will send you a list for ease of reference.
I see we just sent the PDFs

Donald E. Haviland, Jr., Esq
Haviland Hughes
Please note our new address:
124 S. Maple Ave., Suite 220
Ambler, Pa 19002
Ph 215-609-4661
Fax 215-392-4400
Ambler – Philadelphia
Atlantic City – Lehigh Valley
<image001.png>

From: James Dugan <jdugan@dugan-lawfirm.com>
Sent: Wednesday, November 27, 2024 12:08 PM
To: Don Haviland <haviland@havilandhughes.com>
Cc: ecabraser@lchb.com; pgeller@rgrdlaw.com; mdearman@rgrdlaw.com; Bill Platt
<platt@havilandhughes.com>; Lori Dillinger
<LDillinger@havilandhughes.com>
Subject: Re: Opioids TPP

Thanks Don will review what you send

Sent from my iPhone

On Nov 27, 2024, at 10:40 AM, Don Haviland
<haviland@havilandhughes.com> wrote:

James,
It was a pleasure catching up with you.
As explained, we got confirmations for only a few, even though they were all sent in the same manner.
We asked the settlement admin to let us know if they had any issue, and they said it would take 5 days to process. They never responded further.

Copying my partner who oversaw the process for our clients, and my legal assistant.
Lori, please attach to this thread all the opt out forms, in batches of 10 so as not to blow up anyone's email.

James, let us know as soon as you can if we need to do anything further to ensure these opt outs are honored.
As I said, we have had calls with distributor counsel in the Pa case and told them about all the opt outs, and they said nothing.
We can share with you, or whomever, the transmittal emails/confirmations.
If we need to file with the Court, we will.

Thanks, and have a great Thanksgiving with your family.

-Don
Donald E. Haviland, Jr., Esq
Haviland Hughes

Please note our new address:

124 S. Maple Ave., Suite 220
Ambler, Pa 19002
Ph 215-609-4661
Fax 215-392-4400
Ambler – Philadelphia
Atlantic City – Lehigh Valley
<image001.png>

From: James Dugan <jdugan@dugan-lawfirm.com>

Sent: Wednesday, November 27, 2024 11:35 AM

To: Don Haviland
<haviland@havilandhughes.com>

Cc: ecabraser@lchb.com;
pgeller@rgrdlaw.com;
mdearman@rgrdlaw.com

Subject: Re: Opioids TPP

Hi Don, good talking to you. You stated that you have 70 opt outs. Can you please send us all of your forms today? We need to put in our December 2 report and let's follow up next week. Thanks and have a great Thanksgiving
Sent from my iPhone

On Nov 27, 2024, at 6:26 AM,
Don Haviland
<haviland@havilandhughes.com> wrote:

Sure thing
Either call my main number
2156094661 or my cell

2152214941. If reception says
I'm on a call have her put u
thru.

Sent from my Verizon,
Samsung Galaxy smartphone
Get [Outlook for Android](#)

From: James Dugan
<jdugan@dugan-lawfirm.com>
Sent: Tuesday, November 26,
2024 8:27:30 PM
To: Don Haviland
<haviland@havilandhughes.com>
Cc: Annie McAdam
<amcadam@dugan-lawfirm.com>
Subject: Re: Opioids

Don what about a call at
1000cst 1100est in the
morning?
Sent from my iPhone

On Nov 26, 2024,
at 6:12 PM, Don
Haviland
<haviland@havilandhughes.com>
wrote:

Annie
I just tried James'

cell but couldn't
leave a message.
I've left the office
for the day so
unless it's urgent,
we can talk tmrw
Don

Sent from my
Verizon, Samsung
Galaxy
smartphone
Get [Outlook for
Android](#)

From: Don Haviland
<haviland@havilandhughes.com>
Sent: Tuesday,
November 26, 2024
7:07:46 PM
To: Annie McAdam
<amcadam@dugan-lawfirm.com>
Cc: James Dugan
<jdugan@dugan-lawfirm.com>
Subject: Re: Opioids

Annie
Please try
responding on this
thread
I saw a vm come
through but there
was no message
left
-Don Haviland

Sent from my
Verizon, Samsung

Galaxy
smartphone
Get [Outlook for
Android](#)

From: Annie
McAdam
<amcadam@dugan-lawfirm.com>
Sent: Tuesday,
November 26, 2024
6:10:21 PM
To: Don Haviland
<haviland@haviland-hughes.com>
Cc: James Dugan
<jdugan@dugan-lawfirm.com>
Subject: Opioids

Hello Mr
Haviland,

James was trying
to reach out to
you but his email
is not going
through - if you
could please give
him a call in re
opioids - his cell is
504-214-0903

Thank you.

Annie McAadam
Assistant to
James R. Dugan, II

CAUTION: This email
originated outside of the
Dugan Law Firm. Please
do not reply unless you

have verified the sender.
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<List of Opt Out Plans.xlsx>

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